

Dennis F. Dunne (admitted *pro hac vice*)
Samuel A. Khalil (admitted *pro hac vice*)
MILBANK LLP
55 Hudson Yards
New York, New York 10001-2163
Telephone: (212) 530-5000
Facsimile: (212) 530-5219

and

Gregory A. Bray (SBN 115367)
Thomas R. Kreller (SBN 161922)
MILBANK LLP
2029 Century Park East, 33rd Floor
Los Angeles, CA 90067
Telephone: (424) 386-4000
Facsimile: (213) 629-5063

*Counsel for the Official Committee
of Unsecured Creditors*

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF CROSS-MOTION OF
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR
LEAVE TO APPEAL ORDER
REGARDING POSTPETITION
INTEREST**

Date: TBD

Time: TBD

Judge: TBD

1 **PLEASE TAKE NOTICE** that on January 29, 2019, PG&E Corporation and Pacific Gas
2 and Electric Company, as debtors and debtors in possession (together, the “Debtors”), in the above-
3 captioned chapter 11 cases, each filed a voluntary petition for relief under chapter 11 of title 11 of
the United States Code with the United States Bankruptcy Court for the Northern District of
California (San Francisco Division) (the “Bankruptcy Court”).

4 **PLEASE TAKE FURTHER NOTICE** that on February 20, 2020, the Ad Hoc Committee
5 of Holders of Trade Claims filed its *Notice of Appeal and Statement of Election to Have Appeal*
6 *Heard by District Court* [Docket No. 5844], its *Motion of the Ad Hoc Committee of Holders of*
7 *Trade Claims for Leave to Appeal Order Regarding Postpetition Interest* (the “Trade Committee
8 Motion”) [Docket No. 5845], and its *Memorandum in Support of Motion of the Ad Hoc Committee*
9 *of Holders of Trade Claims for Leave to Appeal Order Regarding Postpetition Interest* [Docket
10 No. 5846].

11 **PLEASE TAKE FURTHER NOTICE** that, pursuant to 28 U.S.C. § 158(a)(3) and
12 Federal Rule of Bankruptcy Procedure 8004, the Official Committee of Unsecured Creditors (the
13 “Creditors’ Committee”) has filed a *Cross-Motion of the Official Committee of Unsecured*
14 *Creditors for Leave to Appeal Order Regarding Postpetition Interest* (the “Cross-Motion”). The
15 Cross-Motion was filed concurrently with the Creditors’ Committee’s *Notice of Appeal and*
16 *Statement of Election to Have Appeal Heard by District Court*.

17 **PLEASE TAKE FURTHER NOTICE** that the Cross-Motion may be heard by the United
18 States District Court of the Northern District of California (the “District Court”) at a date and time to
19 be set by the District Court. Pursuant to Federal Rule of Bankruptcy Procedure 8004(c)(3), however,
20 any relief requested in the Cross-Motion may be granted without a hearing.

21 **PLEASE TAKE FURTHER NOTICE** that copies of the Cross-Motion and related papers
22 can be viewed and/or obtained: (i) by accessing the Bankruptcy Court’s website at
23 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
24 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ notice and claims agent, Prime
25 Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for
26 U.S.-based parties; or +1 (929) 333-8977 for international parties or by email at:
27 pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the
28 Bankruptcy Court’s website.

DATED: March 5, 2020

MILBANK LLP

/s/ Gregory A. Bray

DENNIS F. DUNNE

SAMUEL A. KHALIL

GREGORY A. BRAY

THOMAS R. KRELLER

*Counsel for the Official Committee of
Unsecured Creditors*